

Exhibit D

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Joel Schneider,
Magistrate Judge

JOINT STIPULATION REGARDING DISMISSAL OF TORRENT PRIVATE LTD.

WHEREAS, Plaintiffs have named Torrent Private Ltd. as a Defendant in this Action;

WHEREAS, on May 31, 2019, Samir Uttamlal Mehta signed an affidavit stating that Torrent Private Ltd. (“TL”) is not engaged in the manufacture, sale, or distribution of -sartan containing products, that TL is a financial holding company that holds Torrent Pharmaceuticals Ltd. (“TPL”), as well as other non-pharmaceutical Torrent entities, and that TL owns a majority of shares in TPL, but is not the sole shareholder of TPL; and

WHEREAS, Plaintiffs will dismiss TL without prejudice and avoid naming TL in the future in exchange for (1) TL’s and TPL’s agreement to not oppose a future motion to amend to add TL as a party based on information adduced in discovery, so long as such motion is made in good faith, and that any such addition shall relate back to the filing of the original complaint for statute of limitation and repose purposes, and (2) TPL’s agreement to allow Kirkland & Ellis LLP and any successor counsel to accept service on behalf of TPL in lieu of Hague service.

It is hereby STIPULATED AND AGREED, by and among the undersigned counsel as follows:

1. Plaintiffs will dismiss TL without prejudice, and TL and TLP agree not to oppose Plaintiffs' motion to add TL as a party based on information adduced in discovery, so long as such motion is made in good faith, and any such addition shall relate back to the filing of the original complaint for statute of limitation and repose purposes.

2. Undersigned counsel for TPL are authorized to accept, hereby do accept, and will continue to accept service of the summonses and complaints in the Action related to Valsartan, Losartan, and Irbesartan on behalf of TPL in lieu of Hague service, without prejudice and without waiver of any TPL's defenses, objections, or arguments in this matter or any other matter, except for those concerning service. TPL agrees that the undersigned counsel's successors will be given the same authorization. By entering into this Stipulation, Plaintiffs shall not waive, and expressly preserve, all rights, claims, and defenses.

IT IS SO STIPULATED.

Dated: November 13, 2020

Respectfully submitted,

/s/ Adam Slater

Adam Slater

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Liaison Counsel for Plaintiffs

/s/ Devora W. Allon

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***Counsel for Torrent Pharmaceuticals Ltd. &
Torrent Private, Ltd.***

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[PROPOSED] ORDER

AND NOW, on this _____ day of _____ 2020, upon consideration of the attached Stipulation, which applies to Civil Action No. 19-md-2875, it is hereby **ORDERED** that the Stipulation is **APPROVED** and Torrent Private Ltd. is hereby dismissed without prejudice from this Action.

It is so **ORDERED**.

BY THE COURT:

ROBERT B. KUGLER, J.